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FCC MAIL ROOM

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COMMENTS ON: RM-9208

Dear Commission Members:

I am an FCC licensed engineer (1971), currently in my 3rd year of doing a local radio program on KTOB-AM, Petaluma Ca.

It would appear that the FCC is concerned about the consolidation of radio, and I believe this is good, for the simple reason that consolidation will lead to more "Pirates." I feel the main reason that there is high-power pirates (over 100 watts) is because:

- A) They can't afford the **lawyer's fees** associated with getting a license.
- B) Opportunities for employment, or even working for **free** at conglomerate stations is dwindling.

Please consider these suggestions for low power "Neighborhood" stations:

- 1) Allocate frequency(s) on the AM&FM band.
- 2) Give the station operators a real piece-of-paper license. Annual Fee: \$250.
- 3) Make them accountable--the equipment should be professionally built, **not** homemade.
- 4) Keep the greedy people out by **not** allowing the station to be **sold** for any sort of profit.
- 5) Allow power levels to 1000 Watts; Antennas to 100' HAAT
- 6) First come, first served. If multiple applications, a lottery system.
- 7) One station limit, and owner(s) must reside in city of license. No owner(s) outside city.
- 8) Minimum Hours per day: 12.
- 9) Proofs of compliance must be submitted at time of license renewal.

Please consider these changes to part 15 (the 100Milliwatt rule):

- 1) Allow power levels to 5 watts.
- 2) Allow antenna length to 50 ft. HAAT **provided that:**

- A) The operator has a licensed engineer certify that there is no interference to licensed stations.
- B) Equipment is professionally built & meets FCC specs.
- C) Station operator provides FCC and all local stations a phone number, in case of problems.

Failure of the FCC to do something about licensing low power stations will result in the continuation of stiff prison sentences for what amounts to a victimless crime. The Department Of Justice can quote all the crime statistics they want about violent crime ebbing, all I know is Arthur Kobres, the

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pirate in Florida, may get 28 years in prison, while a Methamphetamine-crazed woman who tried to torch my house and also tried to kill a 12 year old kid with a Machete got 1 year probation, and went right back to doing Meth.

Conglomerate Radio Documentation

For the rest of this letter, I want to provide a brief overview of radio stations in the Santa Rosa Ca. area, which probably reflects what's going on around the country and shows why there's a need for community stations.

Ten years ago I moved to the Russian River area. (see map) Santa Rosa has a dozen or so radio stations. However, due to topography, only 2 radio stations, KMGG-FM (97.7) and KSRO-AM, (1310) cover Guerneville, Rio Nido and Monte Rio. TV stations can not be received without cable or satellite receivers.

KMGG has been sold 3 times in 10 years. One conglomerate owned it for what probably amounts to a record: 6 months, then sold it for a hefty profit. KMGG was granted a studio waver, and moved to Santa Rosa. Now, although it ID's as "KMGG, MONTE RIO/SANTA ROSA", it's a toll call to for anyone on the Russian River (including Monte Rio) to call their "local" station. The most recent sale of KMGG was to The Amatero Group, who bought 3 other stations in Santa Rosa, including the other primary station for the Russian River, KSRO-AM.

KSRO used to be Sonoma County's emergency news station. Whenever the Russian River floods (it does that a lot), you could count on KSRO. All Sonoma County stations relied on KSRO for EBS alerts. Now we have EAS, and the Amatero Group. At a recent EAS meeting, Amatero management declined to be the lead station, passing it off to KZST-FM, owned by Gordon Zlot, a resident of the area who apparently cares more about local emergencies than Amatero. All Sonoma county stations now monitor KZST or, of all stations, KCBS in San Francisco!

During the flood last Winter, KSRO did a fair job of covering the flood during the day, but at night. Satellite programs prevented flood coverage. I can't tell you how great it feels to be without light and power, lightning is striking all around you, thunder is shaking the house, and your only source of information is running a Satellite talk program on who the President slept with, and why we should all vote Republican!

I would also like to point out that when KSRO/Amatero management discovered that they were losing one of their precious Satellite programs to KSFO in San Francisco, (an ABC/Disney station) KSRO's Program Director Brian Hudson aired a 10 minute tape loop where he complained about how "Santa Rosa was never going to hear Art Bell again" and in the background, "It's A Small World Afterall" played, continuously, over and over again. A friend of mine monitored this periodically. Since this apparently repeated every night from 10PM to 4AM for 2 weeks, he estimates "It's A Small World" was repeated about 740 times. I called the station and argued that I had no problem picking up Art Bell in Santa Rosa via 3 different stations in other cities, and that there were many more important subjects that could be covered, such as why the DOJ says California is now the #1 Methamphetamine producing state, and Meth. accounts for about 70% of all violent felons in federal prisons, but the Sonoma County Sheriff is ignoring that and trying to

convict crippled ladies in wheelchairs for smoking Medical Marijuana. Needless to say, it fell on deaf ears. It wasn't a Satellite program.

Then there's the Jacor group. I knew what they were trying to do when they bought KMXN-AM (1150) Santa Rosa. They wanted it off the air so they could expand their Los Angeles station on the same frequency to 50KW. KMXN was 5KW and served the Hispanic community of 3 counties. Jacor submitted an engineering report to the FCC suggesting that KMXN could still be on the air with 250 watts, and was granted an STA December '97 to construct a the new KMXN, utilizing KSRO towers, because "Amatero owed them a favor." KMXN management knew it would never materialize. They knew it was just a ruse to keep them quiet. On Christmas, 1997, KMXN-1150AM went dark, forever. Jacor never attempted to construct anything at KSRO. And now if you tune 1150 in Santa Rosa, you'll occasionally hear "L.A. SPORTSTALK RADIO", but it's mostly noise. If the FCC made it possible, KMXN management would try to install a low power transmitter at its Santa Rosa studios. It would be an improvement.

EDITORIAL OPINION

I would like to comment on an article in *Radio World* about pirates, which quotes Howard Anderson, Chairman of the NAB, as saying "What about indecency and obscenity? Most of these operators are really far out on the fringe."

In my files is a small, 3 year old alternative San Francisco newspaper. In this particular issue is a story about KSFO-AM, owned by ABC (before Disney). It's a story about a rabid dog-type announcer named J. Paul Emmerson, who had just been fired by KFRC-FM for making racist comments against Asians and Jews, an immediately hired by KSFO. I'm guessing here that ABC Management told him to stop bashing legitimate minorities, for fear of lawsuits, and told him he could go after Homosexuals. Within a week, KSFO listeners had gotten the message, had managed to obtain the personal phone numbers of some Homosexuals who serve on the San Francisco Board Of Supervisors and were calling in **death threats to the supervisors!** One supervisor said she got well over 25 death threat calls, and a dozen or so threats of **rape**. Needless to say, supervisors, even the mayor called KSFO management, but it took another **month** before ABC management fired Emmerson. Not due to his comments on Homosexuals, but because he said bad things about ABC management!

I am not aware if the FCC ever got word about this incident, but I think the FCC and the NAB should consider the implications of the "Hot Talk" radio format. It is in my mind that the recent bombings, such as the Oklahoma Federal Building, got their start from these Hot Talk stations. And in fact, if this is what the NAB represents, I don't want to have anything to do with them.

Finally, I'd like to close with one last suggestion: it is the Republican ideal to "turn back control to the state". The FCC was originally created to license stations and to prevent interference. It has repeatedly tried not to intervene with programming. So why not give programming power to the states? Let people vote on which conglomerate gets to buy which station! Let the conglomerates tell their public what they are getting before the change is made. It's only fair. We have to listen to these bozos.

